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Since the funding available for Priority 2 projects is rapidly decreasing and may soon disappear altogether, revisions to the E-rate program are necessary. Whether the E-rate Funding Cap should be increased, temporarily or permanently, depends on the adoption of other proposed reforms. Before changing the Funding Cap, the Beaufort County School District (BCSD) favors the adoption of a per-student funding formula (with possible revision of the Discount Rate calculation); elimination of the Priority System; and allowing applicants flexibility in deciding on which projects (E-rate eligible equipment and services) to focus their efforts. Future Increases of the Funding Cap may be necessary in order to fully satisfy the demands of the 21st Century Learning and ConnectEd initiatives.

BCSD has been generally fortunate in its ability to fund most technology initiatives using methods of funding that are enhanced by E-rate support. The current lack of E-rate support for Priority 2 projects at schools with DRs of less than 90% and delays in receiving funding commitment decisions have adversely affected BCSD's ability to schedule and complete some technology initiatives. Planning is more difficult and implementation decisions are constantly revisited and altered. Less than 25% of BCSD's schools are 90% sites which causes equity issues and has additional impacts on planning efforts.

Life-cycle replacement of network equipment issues are a challenge to BCSD, and planning decisions are skewed by the uncertainty and the delays in E-rate funding.

21st Century Learning goals do warrant the increased bandwidth goals outlined in the ConnectEd initiative. Common Core Standards and online testing will require more bandwidth as will increases in student mobility in various learning environments, and 1-to-1 computing and BYOD initiatives.

Data collection can be helpful and may lead to system design solutions that promote educational achievement, but the data collection suggested in the NPRM seems to be almost solely focused on measuring technology and not educational outcomes. The data collection burden placed on applicants and service providers will be significant in both cost and manpower and seems contrary to the goal of simplifying the program.

BCSD anticipates the need for 2Gbps by 2015 and more than 20Gbps by 2017-2018 if BCSD is expected to meet the goals of ConnectEd. The primary barriers to achieving these bandwidth goals are:

- Cost – of the bandwidth itself whether leased from a Service Provider, as BCSD does now, or built and owned partially by BCSD;
- Cost – of the equipment and its installation for transport to each classroom
- Choke points – several network components at BCSD's data-center level are currently only capable of a maximum 1Gbps throughput to the Internet. In order to exceed 1Gbps to the Internet, these components would need to be upgraded to accommodate speeds of 10Gbps.

BCSD has received E-rate support for Priority 2 projects in the past but nothing significant since FY2008-2009 (installed primarily during 2010). BCSD used FY2008-2009 E-rate support to purchase and install telephony systems, network switches, servers, UPSs, and wireless APs and controllers in its 90% schools (6 sites). BCSD used other budgeted funds to pay for these initiatives in all of its other schools (27 sites).

Much of this equipment will soon reach its end of life at many BCSD sites, particularly some aging telecommunications systems, and BCSD needs to plan for its replacement in the next one to two years.